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February 15, 2024

Via ECF and E-mail:

[Tala Doumani@nysd.uscourts.gov](mailto:Tala.Doumani@nysd.uscourts.gov)
District Court Judge Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 105
New York, New York 10007

MEMO ENDORSED

Re: Salerno, Louise v. Whole Foods Market Group, Inc.
Docket No: 23 Civ. 8198 (KPF)

Dear Judge Failla:

We represent defendant Whole Foods Market Group, Inc. ("WFM") in the above-referenced matter.

Pursuant to ECF Rule 21.7(b), the undersigned respectfully requests a permanent sealing of Exhibits (1) and (3) to WFM's letter opposition dated February 12, 2024 (PACER [Doc. No. 22](#)). In accordance with the provisions set forth in this Court's Confidentiality Stipulation and Protective Order of December 6, 2023 (PACER [Doc. No. 20](#)), this application is made as WFM's surveillance disclosures dated December 8, 2023 and February 12, 2024 provide publicly available links to WFM's surveillance footage which indicate the vantage points and reach of WFM's security cameras in its stores, and cannot become public knowledge for security purposes.

Thank you for your time and consideration.

Respectfully submitted,

CHARTWELL LAW

By: Jarett L. Warner
Jarett L. Warner

cc: Matthew Haicken, Esq. (*via e-mail and ECF*)
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Application GRANTED. In accordance with the Court's Confidentiality Stipulation and Protective Order of December 6, 2023 (Dkt. #20), the Clerk of Court is directed to keep Exhibits 1 and 3 of docket entry number 22 under seal, viewable only to the parties and the Court.

The Clerk of Court is directed to terminate the pending motion at docket number 23.

Dated: February 16, 2024
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE